



GEHI & ASSOCIATES
ATTORNEYS & COUNSELLORS AT LAW

THE PICKMAN BUILDING • 118-21 QUEENS BLVD. • SUITE 411, 4TH FL. • FOREST HILLS, NY 11375
TEL: (718) 263-5999 • FAX: (718) 263-1685

March 23, 2015

VIA ECF

Honorable Annalisa Torres
United States District Court
Southern District of New York
500 Pearl Street
New York, N Y 10007

Re: Palmer, et al. v. Trump Model Management LLC., et al
1:14-cv-08307-AT

Dear Judge Torres:

I represent the above referenced Plaintiffs. On February 3, 2015, your Honor entered an Order detailing the parties' briefing schedule on a Motion to Dismiss with the following deadlines:

1. Defendants shall file their motion to dismiss by March 3, 2015;
2. Plaintiff shall file her opposition papers by March 17, 2015;
3. Defendants shall file their reply papers by March 24, 2015.

The Defendants' dismissal motion was timely filed, but due to inadvertent error, the undersigned was under the mistaken belief that Plaintiff's deadline to file her opposition papers was March 24, 2015. As such, the Plaintiff's Memorandum in Opposition to Defendants' Motion to Dismiss was untimely filed by my firm on March 21, 2015. I apologize for this mistake and respectfully request the Court to accept Plaintiff's opposition papers as timely filed.

Upon service, the Defendants rejected plaintiff's opposition papers as untimely. However, I have since spoken to Patrick McPartland, Esq., counsel for Defendants, regarding my firm's inadvertent error, and he indicated that the Defendants would not object to an application by the Plaintiff to the Court that the papers be deemed timely filed, so long as the briefing schedule were further modified to allow the Defendants to file their reply papers by on or before April 16, 2015. This revised schedule is necessary to accommodate Mr. McPartland's personal and professional schedule over the next few weeks. This letter was reviewed and approved by Mr. McPartland prior to my submission.

Thank you for your time and consideration in this matter.

Respectfully submitted,

s/Narish Gehi

Narish Gehi, Esq.

cc: VIA ECF
Patrick McPartland, Esq.
Lawrence S. Rosen, Esq.
LaRocca Hornick Rosen Greenberg & Blaha LLP
Counsel for Defendants